

26

Case 2:10-cv-10978-PJD-MJH

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA,
COLLEGE OF MEDICINE, a foreign corporation,

Plaintiff,

V

CASE No.: 2:10-cv-10978-PJD-MJH
Judge Patrick J. Duggan
Judge Michael Hluchaniuk, referral

STEVEN WOODWARD,

Defendant,

Motion to Compel Sallie Mae

U.S. DIST. COURT CLERK
EAST DIST. MICH
FLINT

2011 MAR 17 P 4:12

FILED

Motion to Compel Sallie Mae

List of Exhibits:

- Exhibit 1. Devin Hewitt, Dated October 13, 2010
- Exhibit 2. Nellie Mae Loan Certificate, 11/07/06
- Exhibit 3. Nellie Mae Loan Certificate, 1/06/06
- Exhibit 4. Email Sevrine Barrie to ECFMG, May 6, 2008
- Exhibit 5. May 8, 2008 ECFMG USMLE ineligible
- Exhibit 6. May 21, 2008 Letter of Dismissal
- Exhibit 7. Sallie Mae Address
- Exhibit 8. Sallie Mae Michigan
- Exhibit 9. Subpoena to Sallie Mae

The Plaintiff and their business partners have acted in Bad Faith concerning Discovery, violating Federal Rules 26.

1. American University of Antigua College of Medicine advertised loan availability and processed student loans from Sallie Mae under false pretenses as demonstrated in **(Exhibit 1).**

“I have researched your account and have confirmed that you have three Excel Grad Loans that are serviced by Sallie Mae. These loans were borrowed to finance your attendance at Kasturba Medical College; not American University of Antigua.”

“NOT AMERICAN UNIVERSITY OF ANTIGUA”

Unknowing, students were involved in these loan programs processed under false pretenses.

The Nellie Mae Loan Certifications, **Exhibit 2** and **Exhibit 3**, is further evidence of the fraud committed by American University of Antigua College of Medicine and Greater Caribbean Learning Resources.

The Nellie Mae Loan Certificates are written under Kasturba Medical College letterhead with nothing indicating that the Defendant attended the American University of Antigua College of Medicine.

The Nellie Mae Loan Certificates are signed and dated by Sevrine Barrie, Dean of Registrarial and Student Services.

Sevrine Barrie was an employee of American University of Antigua College of Medicine, c/o Greater Caribbean Learning Resources, New York as seen in **Exhibit 4**.

The Nellie Mae Loan Certifications are fraudulent, falsified records to a financial institution, to deceive Sallie Mae and/or to work with Sallie Mae to deceive and issue student loans under false pretense.

In any case the students, young United States Citizens, suffer from the lies and fraud by the hand of American University of Antigua College of Medicine, Greater Caribbean Learning Resources, Neal S. Simon, Peter Bell, Sevrine Berrie and his employees violating at least:

U.S. Code Title 18, PART I, Chapter 47

U.S. Code Title 18, PART I, Chapter 63

2. Sevrine Barrie has conspired against the Defendant before.

Sevrine Barrie conspired to, and committed fraud before against the Defendant, denying the opportunity to take the United States Medical Examination, USMLE, Step I medical board exam. The Defendant earned the right to sit for the exam, the Defendant was registered to take the exam, and the exam was paid for.

On May 6, 2008 Sevrine Barrie wrote an email, **Exhibit 4**, to Bill Kelly of the ECFMG.

“This is to inform you that Steven Woodward is no longer enrolled at the American University of Antigua”

May 8, 2008 ECFMG notified the Defendant that they were no longer eligible to take the USMLE, Step I exam, **Exhibit 5**.

“ECFMG has recently received information indicating that you no longer meet all eligibility requirements to take USMLE examinations. ECFMG received notice dated May 6, 2008 from the American University of Antigua indicating you were “no longer enrolled” at the American University of Antigua.”

May 21, 2008, Exhibit 6, is the date of wrongful dismissal of the Defendant by the Plaintiff.

This demonstrates the heinous nature and abuse cause against the Defendant by this Wall Street Business (Greater Caribbean Learning Resource), Foreign Business(American University of Antigua College of Medicine), Neal Simon, Peter Bell, and administration and faculty

3. This evidence proves the Document 1 claims made by this Plaintiff are an effort to cover-up these facts, the criminal activities of these people, this industry, and that the Defendant is just and correct about this Plaintiff.

The information requested will prove the Defendant is innocent from the Libel and Slander of the Plaintiff's claims.

Sallie Mae is a United States entity and does business in the State of Michigan as demonstrated in **Exhibit 7** and **Exhibit 8**.

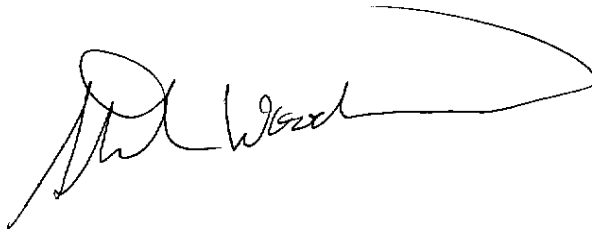
To prove my innocents and prove the fraudulent nature of the Plaintiff, the Defendant requests the information and documentation as written in **Exhibit 9**.

The Plaintiff includes in their Docket 1 Claims, accusations of losing access to funding and student aid is caused by the Defendant, the reality is, this Plaintiff's own actions and fraud are the reasons for not having access to these programs.

The Defendant requests the Court perform the duty, as promised, to determine the truth, demanding production of all the requested documentation in **Exhibit 9**, and to bring justice against these businesses in the effort to protect the Citizens of the United States against the heinous acts committed by the Plaintiff and associated individuals.

The evidence begs the Court to consider the questions; how much fraud has been committed, how many malicious and heinous activities does the Plaintiff engage, and against how many of their students.

Steven Woodward
7211 Brittwood Ln
Flint, MI 48507
(810)235-7267

A handwritten signature in black ink, appearing to read "Steven Woodward", with a long horizontal flourish extending to the right.

SallieMae

www.SallieMae.com

P.O. Box 4200
Wilkes-Barre, PA 18773-4200

October 13, 2010

Mr. Steven L. Woodward
7211 Brittwood Lane
Flint, MI 48507-4623

RE: Your Student Loan Account # [REDACTED]

Dear Mr. Woodward:

This letter is in response to your inquiry requesting assistance with an issue you are having with St. Joseph Mercy Oakland Hospital and The American University of Antigua.

I have researched your account and have confirmed that you have three Excel Grad Loans that are serviced by Sallie Mae. These loans were borrowed to finance your attendance at Kasturba Medical College; not American University of Antigua. Enclosed please find copies of your promissory notes.

I hope that the information and documentation provided are helpful to you. You may contact me directly and toll-free at 888-545-4199, x89180, if you have any questions.

Sincerely,



Devin Hewitt
Office of the Customer Advocate
Sallie Mae

Enclosures

EXHIBIT 1

EXHIBIT 2

No. 8539 P. 1/1

Nellie Mae Loan Certification

App. #: 976417

Date: 11/07/06

File #: 9221

Fax: 866-347-0692

Tel.: 800-335-1900

General Student Information

Student Name: STEVEN L. WOODWARD

Loan Type: MDEXCEL

SSN: [REDACTED]

Academic Loan Period: From: 09/06 To: 12/06

Program of Study: Medicine

Amount Approved: \$ 18,286

* Medical Program of Study includes Dental

Certification of AttendanceAcademic Loan Period: From: 9-6-06-12-26-06 To: 12-26-06 Anticipated Graduation Date: 12-20-2009Student Grade Level: 4Is student enrolled at least 1/2 time? Yes ☒ No ☐**Certification of Cost**

Note: Applicant may borrow a guarantee fee in addition to the amount disbursed.

Fee: 5.000 %

Complete for all students:

Preferred # of disbursements this loan: 1 ☒ 2 ☐ 3 ☐ 4 ☐ Hold / Release:Preferred 1st disbursement date: 11/7/06 and amount: \$ 18,286 H ☐ R ☐Preferred 2nd disbursement date: 1/1 and amount: \$ H ☐ R ☐Preferred 3rd disbursement date: 1/1 and amount: \$ H ☐ R ☐Preferred 4th disbursement date: 1/1 and amount: \$ H ☐ R ☐Total School Certified Amount: \$ 18,286**Certification Options**

Note: Participating institutions only. Call Nellie Mae for program details.

Interest Subsidy Options:

Interest subsidy flat rate.
1 2 3 4 5 6 7 8 9 10Interest subsidy %.
25 50 75 100**College / University Certification**

Note: The school certified amount must not exceed the cost of attendance less other aid for the loan period.

Financial Aid Office:

KASTURBA MEDICAL COLLEGE
PO BOX 8 MANIPAL 576 119
KARNATAKA
INDIA, FC 576104

Signature and Date

Name (please print)

Title (please print)

DOE Code: 008450 00

Sevrine Barrie 11/7/06

SEVRINE BARRIE

Dean of Registration and
Student Services

gwwr/1

TRUE COPY OF THE ORIGINAL

001/001

Nellie Mae Loan Certification

App. #: 736939

Date: 01/06/06

File #: 9221

Fax: 800-931-2200

Tel.: 800-335-1900

General Student Information

Student Name: STEVEN L. WOODWARD

Academic Loan Period: From: 01/06 To: 08/06 Loan Type: MDEXCEL

Program of Study:

medicine

Amount Approved: \$ 34,397

*Medical Program of Study includes Dental

Certification of Attendance

Academic Loan Period: From: 15-06 To: 8-25-06 Anticipated Graduation Date: 5/30/2009

Student Grade Level: A

Is student enrolled at least 1/2 time? Yes ☒ No ☐

Certification of Cost

Note: Applicant may borrow a guarantee fee in addition to the amount disbursed.

Fee: 0 %

Complete for all students:

Preferred # of disbursements this loan: 1 ☐ 2 ☒ 3 ☐ 4 ☐ Hold / Release:Preferred 1st disbursement date: 1/10/06 and amount: \$ 17,198.50 H ☐ R ☐Preferred 2nd disbursement date: 4/21/06 and amount: \$ 17,198.50 H ☐ R ☐Preferred 3rd disbursement date: / / and amount: \$ H ☐ R ☐Preferred 4th disbursement date: / / and amount: \$ H ☐ R ☐

Total School Certified Amount: \$ 34,397.00

Certification Options

Note: Participating institutions only. Call Nellie Mae for program details.

Interest Subsidy Options:

Interest subsidy flat rate.
1 2 3 4 5 6 7 8 9 10Interest subsidy %.
25 50 75 100

College / University Certification

Note: The school certified amount must not exceed the cost of attendance less other aid for the loan period.

Financial Aid Office:

KASTURBA MEDICAL COLLEGE
PO BOX 8 MANIPAL 576 119
KARNATAKA
INDIA, FC 576104

Signature and Date

SEVINE BARRIE
Name (please print)Asst. Dean of Student
Title (please print) Services

DOE Code: 008450 00

EXHIBIT 3

From: Sevrine Barrie [mailto:Sbarrie@AUAMED.ORG]
Sent: Tuesday, May 06, 2008 1:24 PM
To: Kelly, Bill
Subject: RE: ECFMG USMLE /Steven Woodward

Hi Bill:

Thanks for taking the time to return my call.

This is to inform you that Steven Woodward is no longer enrolled at the American University of Antigua. Thank you.

Sincerely,

Sevrine Rodrigues Barrie
Dean of Student Services and Registrar

EXHIBIT 4

From: Kelly, Bill (bkelly@ECFMG.org)
To: steve_l_woodward@yahoo.com;
Date: Thu, February 19, 2009 8:45:14 AM
Cc:
Subject: RE: ECFMG Letter to Mr. Steven Woodward

February 19, 2009

Mr. Woodward:

As requested, I am enclosing a copy of the correspondence from the American University of Antigua that was the basis for ECFMG's notification to you on May 8, 2008.

If you have any questions or need additional information, please let me know.

Sincerely,

William Kelly
Associate Vice President for Operations
ECFMG
3624 Market St., 4th Floor
Philadelphia, PA 19104
USA
Telephone: (215) 823-2277
Fax: (215) 386-9767
Email: bkelly@ecfm.org

From: Steve Woodward [mailto:steve_l_woodward@yahoo.com]
Sent: Thursday, February 12, 2009 11:33 AM
To: Kelly, Bill
Subject: Fw: ECFMG Letter to Mr. Steven Woodward

Mr. Kelly,

Please send me all correspondence that AUA had with ECFMG regarding the attached email.

Thank you for your time,

Steven Woodward

----- Forwarded Message -----

From: "Kesting, Virginia" <VKesting@ECFMG.org>
To: steve_l_woodward@yahoo.com
Sent: Thursday, May 8, 2008 10:43:14 AM
Subject: ECFMG Letter to Mr. Steven Woodward

<<ECFMG Letter to Mr. Steven Woodward.pdf>>

The message is ready to be sent with the following file or link attachments:

ECFMG Letter to Mr. Steven Woodward.pdf

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

This Email has been scanned for all viruses Scanning Services, utilizing A proprietary SkyScan infrastructure.



EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES

3624 Market Street
Philadelphia PA 19104-2685 USA
215-386-5300 215-386-8767 Fax
www.ecfm.org

Personal and Confidential
Via Email

May 8, 2008

Mr. Steven Woodward
7211 Brittwood Ln.
Flint, MI 48507

Re: USMLE™/ECFMG® Identification No. 0-750-143-0

Dear Mr. Woodward:

ECFMG has recently received information indicating that you no longer meet all eligibility requirements to take USMLE examinations. ECFMG received notice dated May 6, 2008 from the American University of Antigua indicating you were "no longer enrolled" at the American University of Antigua.

USMLE and ECFMG policy requires a medical school student to be enrolled in medical school both at the time the individual applies for the examination and at the time the individual takes the examination. Although you may have been enrolled in medical school at the time you applied for an examination, based on the information provided by the American University of Antigua, you are no longer enrolled. Since you are no longer enrolled at the American University of Antigua, you are ineligible to take examinations.

If there is an error in the records of the medical school, you must resolve it with the medical school immediately. As is stated in the ECFMG *Information Booklet*,

"If your eligibility for an exam changes after you apply but before you take the exam, you are required to inform ECFMG immediately of this change in your status."

Also note the following statements in the USMLE *Bulletin of Information*,

"If your eligibility for a Step or Step Component changes after you submit your application but before your scheduled test date(s), you must notify your registration entity promptly. Failure to notify your registration entity that you may no longer be eligible to take the examination may result in a determination of irregular behavior. If you take a Step or Step Component for which you are not eligible, scores for that examination may not be reported or, if previously reported, may be revoked."

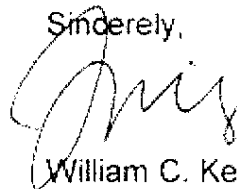
EXHIBIT 5

Mr. Steven Woodward
May 8, 2008
Page 2

You were registered for the USMLE Step 1 (April 2008-June 2008 eligibility period). ECFMG has cancelled your registration for this examination.

If you have any questions or need additional information, please let me know. My telephone number is (215) 823-2277 and my email address is bkelly@ecfm.org.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Kelly", is written over the typed name.

William C. Kelly
Associate Vice President for Operations

/wck

From: Kesting, Virginia (VKesting@ECFMG.org)
To: steve_l_woodward@yahoo.com;
Date: Thu, May 8, 2008 10:43:14 AM
Cc:
Subject: ECFMG Letter to Mr. Steven Woodward

<<ECFMG Letter to Mr. Steven Woodward.pdf>>

The message is ready to be sent with the following file or link attachments:

ECFMG Letter to Mr. Steven Woodward.pdf

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.



**AMERICAN UNIVERSITY OF ANTIGUA
COLLEGE OF MEDICINE**

Friar's Hill Road
P.O. Box W - 1451
St. John's, Antigua, West Indies
Telephone: 268 - 481 - 8888
Fax: 268 - 481 - 8880
Website: www.auamed.org

May 21st, 2008

Mr. Steven Woodward
7211 Brittwood Lane
Flint, Michigan 48507

Dear Mr. Woodward:

On December 19, 2007, a grievance hearing was held based on allegations made against you by American University of Antigua, College of Medicine, Professor Susan Catherine Zona and Trinity Health-Michigan. You were provided with notice of the Grievance and Disciplinary Committee hearing and given the opportunity to testify at the hearing and to provide evidence on your behalf and in your defense which you declined to do.

The Grievance Committee investigated the allegations that you behaved inappropriately, unprofessionally and in a manner not befitting that of a physician during the course of your V Semester studies at Trinity Health-Michigan and, after considering all of the evidence presented, found that your behavior during your V Semester studies was disrespectful and unprofessional. As a result, the Committee recommended that you be dismissed from the University and that, should you apply for re-admission at some future date, the re-admission procedure should include a full review of the Committee's recommendation and the evidence considered at the hearing.

After reviewing the Committee's report, I do agree with its findings. I view your actions as highly unprofessional and improper. Your behavior showed clearly that you failed to live up to the high standards of professional conduct of our profession. I also considered that the finding of the Grievance Committee was not the first such finding rendered against you by a Grievance Committee of the University; a Grievance Committee empanelled in October, 2006 had previously found that you had acted rudely, unprofessionally in an improper manner to one of your professors, among other wrongful acts, as a result of which you were placed on non-academic probation for the Fall semester 2006 and Spring semester 2007 and were required to seek counseling (anger management).

Guided by the forgoing, I have decided to accept the recommendation of the Grievance Committee and hereby notify you that:

1. you are forthwith dismissed from American University of Antigua College of Medicine.

Head office:
#2 Wall Street, 10th Floor, New York, NY 10005
Telephone: 1-212-661-8899 Fax: 1-212-661-8864
<http://www.auamed.org>

EXHIBIT 6

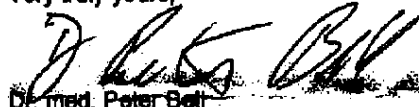
Exhibit

7

2. Should you apply for re-admission to the University at some future date, the re-admission procedure should include a full review of the Committee's recommendation and the evidence considered by the Committee at its hearing.

You may appeal this decision in writing to the President of the University within 14 days of your receipt of this letter. Should you so appeal, you will have the right to counsel and to present witnesses and documentary evidence and your appeal will be heard by the President and at least one other non-involved member of the University's administration in accordance with the University's Rules and Regulations as set forth in its Student's Handbook, a copy of which you had acknowledged in writing that you received.

Very truly yours,



Dr. med. Peter Bell
Vice President Academic Affairs and Executive Dean

cc: Neal Simon, President
AUA, College of Medicine

William Cain, Ph.D.
Chair Grievance and Disciplinary Committee

Ernesto Calderon, MD



Contact us

We're here to help you find the service you need.

Customers with a Manage Your Loans user ID and password can access our customer support link.

Get immediate answers by viewing our frequently asked questions.

General information and account inquiries

Toll free: (888) 2-SALLIE (888-272-5543)
TDD: (888) TDD-SLMA (888-833-7562)

LOG IN TODAY!

[Manage your loans](#)

[Make a payment](#)

[Enter the Great Sallie Mae Giveaway!](#) You could win \$25,000!

TOOLS AND RESOURCES

[Email customer support](#)

ARE YOU LOOKING FOR A FORM?

[Visit our Frequently requested forms page.](#)

If you can't dial toll-free numbers from your location, please call (317) 570-7397.

Business hours are Monday–Thursday, 8:00 a.m.–9:00 p.m. EDT; Friday, 8:00 a.m.–8:00 p.m. EDT.

Fax: (800) 848-1949. Please include a cover sheet with your name and account number.

Mail loan payments to:

Sallie Mae, Inc.
P.O. Box 9532
Wilkes-Barre, PA 18773-9532

Cosigners: Please send your payments to:

Sallie Mae, Inc.
P.O. Box 9555
Wilkes-Barre, PA 18773-9555

To ensure accurate processing, include a note with your payment requesting the payment be applied to only those loans you have cosigned. Please also indicate the primary borrower's account number on the memo line of your check to further ensure accurate processing.

Specific contact information

Select an option

PRIVATE STUDENT LOANS

[Smart Option Student LoanSM](#)
[Career Training LoanSM](#)
[Medical Residency & Relocation LoanSM](#)
[Dental Residency & Relocation LoanSM](#)
[Global Health Residency & Relocation LoanSM](#)
[Bar Study LoanSM](#)
[K-12 Family Education LoanSM](#)

SAVINGS AND CDS

[High-Yield Savings Account](#)
[Certificates of Deposit](#)

529 SAVING PLANS

[Arkansas 529 Plan](#)
[Colorado 529 Plan](#)
[Hawaii 529 Plan](#)
[Idaho 529 Plan](#)
[Indiana 529 Plan](#)
[Iowa 529 Plan](#)
[Missouri 529 Plan](#)
[Nevada 529 Plan](#)
[New York 529 Plan](#)
[North Dakota 529 Plans](#)

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[After Graduation](#)

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[Corporate Overview](#)
[Philanthropy](#)
[The Sallie Mae Fund](#)
[Site Map](#)

EXHIBIT 7

Tutorial Financing Loan

Pennsylvania 529 Plan

Wyoming 529 Plan

Upromise College Fund 529
Plan

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Michigan college planning

MICHIGAN FAFSA DEADLINE

March 1

This page lists college-planning resources unique to Michigan higher education institutions, savings plans, state financial aid, and special programs.

MICHIGAN RESIDENCY REQUIREMENT

To qualify for in-state tuition, the domicile of a minor or dependent student is presumed to be the same as that of the student's natural parents. If only one parent is domiciled in Michigan, the student will be presumed to be a Michigan domiciliary regardless of whether that parent is the student's custodial parent.

Contact the school you plan to attend for their requirements.

HIGH SCHOOL GRADUATION REQUIREMENTS

The Michigan Merit Curriculum (PDF) requires students to complete 16 specific state credits for graduation.

Michigan higher education agencies

- Michigan Department of Education
- Michigan Higher Education Assistance Authority
- Michigan Education Association
- Michigan Community College Association

Michigan higher education institutions

- Michigan's public education institutions
- Michigan's private education institutions
- Michigan Community College NETWork: list of community colleges

FEATURED RESOURCES

ScholarShop® teaches students in grades 4-12 that there is real power in their choices — power to create their future through education. Find a local ScholarShop site.

Sallie Mae's free scholarship search offers an award database containing more than 3 million scholarships worth in excess of \$16 billion.

Use College Answer's School Search Tool to compare colleges.

Savings plans

- Michigan Education Savings Program (MESP) (529)
- Michigan Education Trust (MET) (prepaid state tuition plan)

State financial aid programs

Michigan offers a variety of financial aid programs such as grants, scholarships, and other awards for students who want to further their education beyond high school.

- State of Michigan scholarships and grants
- Michigan Promise Scholarship
- Tuition Incentive Program (pdf)

To qualify for federal and other sources of financial aid, you must file the FAFSA by March 1.

Benefits for veterans

- Michigan Department of Military and Veterans Affairs
- Michigan Veterans Education and Training
- Children of Veterans Tuition Grant (pdf)
- Michigan National Guard Education Benefits
- Troops to Teachers assists eligible military and reserve personnel transition to a new career as public school teachers in schools serving students from low-income families.

Special programs

- Michigan Education Association Scholarship
- Michigan Competitive Scholarship (pdf)
- Livonia Career Intern Program
- Michigan Engineering Incentive

PRIVATE STUDENT LOANS

Smart Option Student Loan®

- Fixed Repayment Option
- Interest Repayment Option

Career Training Smart OptionSM Student Loan

SAVINGS AND CDS

- High-Yield Savings Account
- Certificates of Deposit

529 SAVING PLANS

- Arkansas State Plan
- Colorado State Plan
- Hawaii State Plan
- Idaho State Plan
- Indiana State Plan

COLLEGE PLANNING

- Before College
- Getting a Loan
- After Graduation
- Scholarships

ABOUT US

- Careers
- News & Information
- Investors
- Corporate Overview
- Philanthropy

EXHIBIT 8

- Fixed Repayment Option

Interest Repayment Option

Medical Residency & Relocation LoanSM

Dental Residency & Relocation LoanSM

Global Health Residency & Relocation LoanSM

Bar Study LoanSM

K-12 Family Education LoanSM

Tutorial Financing Loan
- Iowa State Plan

Missouri State Plan

Nevada State Plan

New York State Plan

North Dakota State Plans

Pennsylvania State Plan

West Virginia State Plan

Upromise College Fund

529 Plan
- HELP

FAQs

Contact Us
- The Sallie Mae Fund

Site Map

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SLM Corporation and its subsidiaries are not sponsored by or agencies of the United States of America.

SA088 (Rev. 12/06) Subpoena in a Civil Case

UNITED STATES DISTRICT COURT

Eastern District of Michigan

Subpoena In A Civil Case

American University of
Antigua College of Medicine
PlaintiffSteven Woodward^{V.} DefendantCase Number: 10-cv-10978-PJD-MJH
Judge Patrick J. DugganTO: Sallie Mac
220 Lasley Ave
Wilkes-Barre, PA 18706☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): I request copies of all Loan Certifications concerning Sallie Mac and Students from American University of Antigua College of Medicine as defined in Exhibit 1. I request copies of all documentation concerning the lending status and actions between Sallie Mac and the American University of Antigua College of Medicine as defined in Exhibit 1.PLACE Steven Woodward 7211 Briarwood Ln Flint, MI 48507
Steve L Woodward@yahoo.com

DATE AND TIME

11/29/2010

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

D. J. Miller

Deputy Clerk

DATE

October 8, 2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

DAVID J. WEAVER, Court Administrator
Theodore Levin U.S. Courthouse, 231 W. Lafayette Street, Detroit, MI 48226 313-234-5015

(See Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), on next page)

If action is pending in district other than district of issuance, state district under case number.

EXHIBIT 9

Exhibit 1

Please do not include any private student information other than what is included in Exhibit 2.

- 1) I request a copy of all Loan Certifications for every, or any, student named in Exhibit 2.
- 2) I request a copy of all Loan Certifications signed by Sevrine Barrie.
- 3) I request a copy of all Loan Certifications for every student from the American University of Antigua College of Medicine, AUA.
- 4) I request a copy of all contracts between Sallie Mae and the American University of Antigua College of Medicine, AUA, and partners, that would entitle AUA students to all/any Sallie Mae loan program(s).
- 5) I request a copy of all/any application(s), proposal(s), and/or request(s) from the American University of Antigua College of Medicine to Sallie Mae for all/any loan program participation, entitlement, and/or eligibility.
- 6) I request a copy of all/any Sallie Mae reply to all/any American University of Antigua College of Medicine's application(s), proposal(s), and request(s) for all/any Sallie Mae loan program(s) concerning AUA students.
- 7) I request a copy of all Sallie Mae's deletion, cancellation, retraction, denial, or refusal of service for all/any loan program participation concerning the American University of Antigua College of Medicine.
- 8) I request a copy of all documentation of grievances, claims, or legal actions known by Sallie Mae concerning American University of Antigua College of Medicine.
- 9) I request a copy of all/any documentation that would grant all/any American University of Antigua College of Medicine student entitlement, eligibility, and/or access to all or any Sallie Mae loan program(s), include all said dates for which loans would be available to entitled AUA student(s).
- 10) I request all documentation concerning the lending status of the American University of Antigua College of Medicine for all/any Sallie Mae loan programs between 2003 until November 2010.

Contact Information:

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Petrova, Veronika
Kannankeril, Joe
Stevenson, Clinton
Adamu, Hephzibah
Thomas, Debra
Devaney, Thomas
Linkowski, Micheal
Robinson, Gail
Romanik, Nikki
Sarathchandra, Janaka
Schroeder, Hilary
Ali, Husam
Abdullah, Sirhan
Kurien, Alvin
Nakhwal, Sukhminder
Crespo-Valez, Carmen
Zverinsky, Aleksandr
Eni, Eni
Ashley, Cherise
Boakye, Kwaku
Kamash, Tamer
Lanphear, Eric
Martin, Nathan
Soresen, Hollie
August, Mihenka
Belpulsi, Danamarie
Cafiero, Ralph
Haddad, Mousa
Pate, Judy
Lima, Ateaya
Merkley, Kenneth
Nwagbo, Anthonia
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Okoro, Phillip
Okoronkwo, Earnest
Toussaint, Pierrette
Andhavarapu, Venkatesh
Aguilera, Francia
Corbin, Aaron
Knowles-James, Cerise
Kohli, Navreet
Pennisi, Dominic

EXHIBIT 2

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Tadros, Adeeb
Gnanashekar, Ephraim
Huda, Sophia
Selvarajah, Priya
Shahzad, Humara
Thomas, Lisa
Tiwana, Raju
Vijayan, Pravin
Felix, Ashvin
Jain, Atul
Muhammad, Aqeel
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Hadawy, Angel
Lafond, Fritzanella
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Yun, Roderick
Beranger, Alexandria
Martin, Ravonna
Shodunke, Temilope
Zimmerman, Sara
Davis, Barbara
Jackson, Larry
Kaur, Harjeet
Kalaria, Neha
Syed, Hassan
Ahmadi, Yunus
Dabas Vivek
Ferrol, Isaline
France, Kenneth
Franklin, Bina
Kodali, Smila
Loza, Alejandro
Bagenholm, Allyson
Bhaskarla, Niveditha
Crew Erica
Ioffe, Julia
Isacoff, Adam
Lambert, Nahesi
Miskin, Chandrabhaga
Rao, Panisri
Shahani, Monica
Tahir, Hina
Uppal, Amandeep
Chumak, Maxim
El-Sherif, Dana
Harden, Kimberly
Marin, Louis
Panchal, Roshni
Patel, Rupal

Patel, Samir
Bastien, Carl-Frederic
Beckwith, Micheal
Faustin, Guerry
Jones, Takaya
Lapikov, Vitaliy
Oyelowo, Doyin
Patel, Bhavika
Patel, Bhavika
Rojas, Luis
Soyoya, Tajudeen
St.Denis, Anthony
Freier, Richard
Kidd, Vicki
Oyedepo, Babadele
Soni Ambica
Thoman, Stacey
Ajayi, Olumide
August, Elizabeth
Kumar, Seema
Patel, Dipesh
Saleh, Tarek
Stair, Erin
Ajala, Khaalisha
Ansari, Osama
Barrett, Shean
Ghani, Helal
Akitan, Abosede
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Hasselfeld, Randl
Baker, Iyad
Woodard, Jameson
Pate, Amy
Polynice, Judette
Cheruku, Sreekanth
Relly, Thomas
Gray, Sanjiv
Patel, Amit
Rao, Ryan
Torabi, Radmehr